UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105-3901

Waste Management Division
RCRA Enforcement Office

Purpose:	RCRA Compliance Evaluation Inspection
Facility Name:	Cal-Tron Plating, Inc.
Facility Location:	11919 Rivera Road Santa Fe Springs, CA 90670
Facility Mailing Address:	Same as above
EPA ID Number:	CAD 008 237 950
Date of Investigation:	November 4, 2003
EPA Representative(s):	Ronald Brown Environmental Protection Specialist (415) 972-3292 (415) 947-3530 fax brown.ron@epa.gov Cameron McDonald Environmental Scientist
DTSC Representative(s):	None
CUPA Representative(s):	None
Facility Representative(s):	Carl Troncale, Jr. Vice President Cal-Tron Plating, Inc. Jesus Bautista, operator Wastewater Treatment Plant
Report Prepared By:	Ronald Brown
Date of Report:	December 29, 2003

INTRODUCTION

On November 4, 2003, U.S. Environmental Protection Agency (U.S. EPA) inspectors Ron Brown and Cameron McDonald conducted a hazardous waste inspection of Cal-Tron Plating, Inc., located at 11919 Rivera Road, Santa Fe Springs, California ("Cal-Tron" and the "facility").

The purpose of the inspection was to determine the facility's compliance with applicable federal and state hazardous waste statutes and regulations, i.e., the Resource Conservation and Recovery Act (RCRA), as amended; the implementing regulations adopted in the Code of Federal Regulations (CFR), Title 40, Parts 260-266, 268, 270, 273 and 279; the California Health and Safety Code (HSC), Division 20, Chapter 6.5; and the California Code of Regulations (CCR), Title 22, Division 4.5.

Inspectors conducted a physical inspection of the facility and reviewed records related to hazardous waste activities at the facility. Facility representatives met with the inspectors, accompanied them during the physical inspection of the facility, and provided the records requested during the inspection. An exit briefing summarizing the inspection results was held with facility representatives.

FACILITY BACKGROUND

The facility has been at this location since 1976. Approximately 70-75 people work in the metal plating operations, in staggered shifts from 6:00 am to 5:30 pm, six days a week. A copy of U.S. EPA's Small Business Regulatory Enforcement Fairness Act (SBREFA) Information Sheet was given to Mr. Carl Troncale, Jr.

The facility is an electroplater of brass, steel, and aluminum metal parts and has four plating processes: chrome, nickel, copper (using cyanide), and gold. Rinse water and some plating solutions from the plating processes go to a wastewater treatment plant (WWTP) and is discharged to the public sewer under a pretreatment permit. Other spent plating solutions, sludge from the WWTP, and polishing dust are managed as hazardous wastes. Mr. Jesus Bautista is the WWTP operator.

The facility's main business is high end, decorative chrome, and has a North American Industry Classification System (NAICS) code of 332813 (Electroplating, Plating, Polishing, Anodizing, and Coloring).

On August 13, 1980, the facility submitted a Notification of Hazardous Waste Activity [U.S.EPA Form 8700-12 (6-80)] as a generator of listed hazardous wastes (K002, P029 and P106) and was assigned U.S.EPA identification number CAD008237950. Cal-Tron's 1994

Hazardous Waste Management Plan (pages 3-7 through 3-9) also gives information on wastes generated by the facility **(Attachment 1)**.

The facility submitted a Biennial Report for 2001 as a large quantity generator (> 1,000 kilograms per month) of characteristic hazardous wastes (D001-ignitable, D002-corrosive, D003-reactive, D004-arsenic, D007-chromium, and D008-lead) and listed hazardous wastes (F006-wastewater treatment sludges from electroplating operations, F007-spent cyanide plating bath solutions from electroplating operations, and F009-spent stripping and cleaning bath solutions from electroplating operations where cyanide is used in the process). California waste codes 131, 134, 171, 181, 711, 723, 726, and 792 were also listed in the report.

According to Mr. Troncale, the Biennial Report for 2001, and manifests reviewed during the inspection, the facility is a generator of greater than 1,000 kilograms of hazardous waste per month and these are the regulatory requirements which have been applied to the facility.

The facility was last inspected for compliance with hazardous waste regulations on February 4, 2003, by the City of Santa Fe Springs Fire Department. One RCRA violation, i.e., open hazardous waste containers, was found. Additional non-RCRA violations were also listed in the inspection report.

INSPECTION

After providing introductions and credentials, the inspectors explained that it was a routine inspection. Inspectors and the facility representatives then walked through the facility, focusing on the areas where hazardous wastes were generated and accumulated at the facility **(Attachment 2)**.

Walk-Through

Plating area: The metal plating processes are a series of tanks of various acids, bases, plating solutions, and rinse water **(Attachment 3, Photo 1)**. When parts are moved from one process tank to another, the various chemicals and rinse water which adhere to the parts drip on the floor. This liquid collects on the floor **(Photos 2-3)** and is pumped to the wastewater treatment plant. Both Mr. Bautista and Mr. Troncale said that the pump used to move waste liquids from the plating area to the wastewater treatment plant had broken and that they had ordered the wrong parts for the pump. Therefore, the pump used to move waste liquids to the wastewater treatment plant was inoperative at the time of the inspection.

According to Mr. Troncale, the floor of the plating area has been lined with epoxy since the installation of the plating tanks in 1976. Mr. Troncale also said that the epoxy floor coating has been periodically and systematically repaired and recoated to maintain its integrity. Mr. Troncale said that he would submit documentation of repairs to the floor coating for the last

three-five years, but this documentation has not been received as of the date of this inspection report.

Wastewater treatment plant (WWTP): Treatment flow charts for the WWTP were obtained during the inspection. Treatment is conducted in a series of underground tanks **(Photo 4)** and the settled sludge is filter pressed, resulting in F006 hazardous waste **(Photo 5)**. The bin under the filter press where the F006 is collected did not have hazardous waste markings or a label with the required information. The sludge bin was also considered open at the time of the inspection because the sludge filter press was not in operation, and no sludge was being added or removed from the bin.

Paved area behind the main building: At the time of the inspection, the facility was constructing a metal shed for the storage of raw materials and hazardous wastes.

Polishing dust/metal particles from the polishing process are collected by a vacuum system and deposited into Supersacks for transportation and disposal as a non-RCRA hazardous waste (CA code 181) **(Photo 6)**. A hazardous waste determination, including any laboratory analysis, is needed to explain why this wastestream is not a RCRA hazardous waste and manifested with a federal hazardous waste code. The Supersack attached to the vacuum system was closed and properly labeled with the required hazardous waste information.

Another Supersack of "sludge filter cake" was closed and met the hazardous waste marking/labeling requirements. A third, three-quarter-filled Supersack of polishing dust/metal particles was open **(Photo 7)** but did have the required hazardous waste marking/labeling information **(Photo 8)**. The Supersack was labeled as a non-RCRA hazardous waste (CA code 181). A fourth, quarter-filled Supersack of floor sweepings particles was open and did not have any of the required hazardous waste marking/labeling information **(Photos 9-10)**. A hazardous waste determination, including any laboratory analysis, is needed for the floor sweepings.

A 55-gallon drum of polishing dust/metal particles was not closed and did not have the required hazardous waste marking/labeling information **(Photo 11)**. According to facility representatives, this 55-gallon drum of polishing dust/metal particles resulted from the cleaning of the vacuum system when it was broken.

In the center of the paved area on a wood pallet were two, 15-gallon drums of RCRA hazardous waste/chrome solution (D002, D007, D008, CA code 726) which were correctly marked/labeled, but not closed because the shrink wrap covering the tops of the drums would not prevent a spill if the containers fell or were tipped over **(Photos 12-13)**.

Hazardous wastes and reusable plating solutions were being stored along the fence bordering the north side of the paved area **(Photo 14)**. There was inadequate aisle space between the containers of hazardous waste.

By the end of the inspection, the containers in Photo 14 had been moved to separate hazardous waste containers from containers of reusable plating solution, e.g., tin nickel and copper plating solutions **(Photos 15-16)**. There was one 55-gallon drum of hazardous waste (brass stripper) which was correctly marked/labeled but was not closed (only shrink wrapped) and had exceeded the 90-day storage limit i.e., it had an accumulation start date of 7-23-03 **(Photos 17-18)**. There were three, five-gallon containers of hazardous waste (electroless nickel) **(Photo 19)**. One did not have hazardous waste markings or a label, and the two with labels exceeded the 90-day storage limit for large quantity generators, i.e., both had accumulation start dates of 5-6-03 **(Photo 20)**. A hazardous waste determination for both the brass stripper solution and the electroless nickel solution, including any laboratory analysis, is needed for whether these wastestreams are a RCRA hazardous waste and should be manifested with a federal hazardous waste code.

Records Review

Inspectors requested the following records: hazardous waste manifests and land disposal notifications; training records; inspection records; biennial report for hazardous wastes generated in 2001; and contingency plan/Business Emergency Plan information. No violations were observed with the facility's hazardous waste manifests and land disposal notifications, training program, inspection records **(Attachment 4)**, 2001 biennial report, or contingency plan/Business Emergency Plan.

Mr. Troncale was able to find the last proposal for work from Dodge Concrete Surfaces to repair the epoxy lining of the plating area floor **(Attachment 5)**. However, he was not able to obtain more documentation of repair/maintenance of the epoxy coating of the plating area floor during the inspection. Inspectors requested documentation for the last three-five years. Mr. Troncale said that he should be able to obtain these from his records or his contractors that did the work, and would provide them to U.S.EPA.

An exit briefing was held with Mr. Troncale at the end of the inspection, and U.S.EPA inspectors summarized the preliminary findings of the inspection.

ADDITIONAL INFORMATION RECEIVED

On November 19, 2003, Mr. Troncale submitted four hazardous waste manifests (22003060 - 22993063) for the shipment of RCRA and non-RCRA hazardous wastes from the facility and a photograph of the completed raw materials and hazardous waste storage shed **(Attachment 6)**.

However, no additional documentation of maintenance or repair to the epoxy lining of the plating area floor has been received.

POTENTIAL VIOLATIONS

The following are potential violations of the Resource Conservation and Recovery Act (RCRA), as amended; the implementing regulations adopted in the Code of Federal Regulations (CFR), Title 40, Parts 260-266, 268, 270, 273 and 279; the California Health and Safety Code (HSC), Division 20, Chapter 6.5; and the California Code of Regulations (CCR), Title 22, Division 4.5.

RCRA POTENTIAL VIOLATIONS

1. Failure to make hazardous waste determinations as required by 22 CCR § 66262.11 [40 CFR § 262.11].

22 CCR § 66262.11 - Hazardous Waste Determination. A person who generates a waste, as defined in section 66261.2, shall determine if that waste is a hazardous waste using the following method:
(a) the generator shall first determine if the waste is excluded from regulation under section 66261.4 or section 25143.2 of the Health and Safety Code;
(b) the generator shall then determine if the waste is listed as a hazardous waste in articles 4 or 4.1 of chapter 11 or in Appendix X of chapter 11 of this division. If the waste is listed in Appendix X and is not listed in articles 4 or 4.1 of chapter 11, the generator may determine that the waste from his particular facility or operation is not a hazardous waste by either:
(1) testing the waste according to the methods set forth in article 3 of chapter 11 of this division, or according to an equivalent method approved by the Department pursuant to section 66260.21; or
(2) applying knowledge of the hazard characteristic of the waste in light of the materials or the processes used and the characteristics set forth in article 3 of chapter 11 of this division.
(c) For purposes of compliance with chapter 18 of this division (commencing with section 66268.1), or if the waste is not listed as a hazardous waste in article 4 (commencing with section 66261.30), in article 4.1 (commencing with section 66261.50), or in Appendix X of chapter 11 of this division, the generator shall determine whether the waste exhibits any of the characteristics set forth in article 3 of chapter 11 of this division by either:
(1) testing the waste according to the methods set forth in article 3 (commencing with section 66261.20) of chapter 11 of this division, or according to an equivalent method approved by the Department under section 66260.21; or
(2) applying knowledge of the hazard characteristic of the waste in light of the materials or the processes used.
(d) If the waste is determined to be hazardous, the generator shall refer to chapters 14, 15, 18, and 23 of this division for possible exclusions or restrictions pertaining to management of the specific waste.

Potential violations:
Paved area behind the main building -

a. Polishing dust/metal particles from the polishing process are collected by a vacuum system and deposited into Supersacks for transportation and disposal as a non-RCRA hazardous waste (CA code 181) **(Photo 6)**. A hazardous waste determination, including any laboratory analysis, is needed for why this wastestream is not a RCRA hazardous waste and manifested with a federal hazardous waste code.

b. A quarter-filled Supersack of floor sweepings particles was open and did not have the required hazardous waste marking/labeling information **(Photos 9-10)**. A hazardous waste determination, including any laboratory analysis, is needed for the floor sweepings.

c. Along the fence on the north side of the property was one, 55-gallon drum of hazardous waste/brass stripper **(Photos 17-18)** . There were also three, five-gallon containers of

hazardous waste/electroless nickel **(Photo 19)**. Hazardous waste determinations, including any laboratory analysis, are needed for both the brass stripper solution and the electroless nickel solution to determine whether either of these wastestreams is a RCRA hazardous waste and should be manifested with a federal hazardous waste code.

2. Failure to mark or label satellite accumulation containers of hazardous waste as required by 22 CCR §§ 66262.34(e)(1)(C) and (E), and 66262.34(f)(3) [40 CFR § 262.34(c)(1)(ii)].

> **22 CCR § 66262.34 - Accumulation Time.**
> (e)(1) A generator may accumulate as much as 55 gallons of hazardous waste, one quart of acutely hazardous waste (listed in section 66261.33(e)) or one quart of extremely hazardous waste at or near any point of generation, without a permit or grant of interim status, without complying with subsections (a), (b) and (c) of this section, if all of the following requirements are met with respect to this waste:
> ...
> (C) the initial date of waste accumulation is clearly marked and visible for inspection on each container used for accumulation of hazardous waste;
> ...
> (E) the generator complies with subsections (e)(2), (e)(3) and (f)(3) of this section.
>
> (f) Generators who accumulate hazardous waste on site without a permit or grant of interim status shall comply with the following requirements:
> ...
> (3) each container and tank used for onsite accumulation of hazardous waste shall be labeled or marked clearly with the words, "Hazardous Waste." Additionally, all containers and portable tanks shall be labeled with the following information:
> (A) composition and physical state of the wastes;
> (B) statement or statements which call attention to the particular hazardous properties of the waste (e.g., flammable, reactive, etc.);
> (C) name and address of the person producing the waste.

Potential violation: The sludge bin (F006) under the WWTP filter press did not have hazardous waste markings or a label with the required information **(Photo 5)**.

3. Failure to close satellite accumulation containers of hazardous waste as required by 22 CCR §§ 66262.34(e)(1)(D) and 66265.173(a) [40 CFR §§ 262.34(c)(1)(i) and 265.173(a)].

> **22 CCR § 66262.34 - Accumulation Time.**
> (e)(1) A generator may accumulate as much as 55 gallons of hazardous waste, one quart of acutely hazardous waste (listed in section 66261.33(e)) or one quart of extremely hazardous waste at or near any point of generation, without a permit or grant of interim status, without complying with subsections (a), (b) and (c) of this section, if all of the following requirements are met with respect to this waste:
> ...
> (D) the generator complies with sections 66265.171, 66265.172, and 66265.173(a) of this division; and
>
> **22 CCR § 66265.173 - Management of Containers.**
> (a) A container holding hazardous waste shall always be closed during transfer and storage, except when it is necessary to add or remove waste.

Potential violation: The sludge bin (F006) under the WWTP filter press is also considered open because the sludge filter press was not in operation at the time, and no sludge was being added or removed from the bin **(Photo 5)**.

4. Failure to mark or label containers of hazardous waste being accumulated on-site as required by 22 CCR §§ 66262.34(a)(2)and (3), and 66262.34(f) [40 CFR §§ 262.34(a) (2) and (3)].

22 CCR § 66262.34 - Accumulation Time.
a) Except as provided in subsections (c) and (d) of this section and section 66262.35, a generator may accumulate hazardous waste on-site for 90 days or less without a permit or grant of interim status, provided that:
...
(2) the date upon which each period of accumulation begins is clearly marked and
(3) the generator complies with the requirements of subsection (f) of this section;

(f) Generators who accumulate hazardous waste on site without a permit or grant of interim status shall comply with the following requirements:
(1) the date upon which each period of accumulation begins shall be clearly marked and visible for inspection on each container and portable tank;
(2) the date the applicable accumulation period specified in subsection (a) or (d) of this section begins, for purposes of subsections (a) and (b) of this section, shall be clearly marked and visible for inspection on each container and tank; and
(3) each container and tank used for onsite accumulation of hazardous waste shall be labeled or marked clearly with the words, "Hazardous Waste." Additionally, all containers and portable tanks shall be labeled with the following information:
(A) composition and physical state of the wastes;
(B) statement or statements which call attention to the particular hazardous properties of the waste (e.g., flammable, reactive, etc.);
(C) name and address of the person producing the waste.

Potential violations:

a. A quarter-filled Supersack of floor sweepings particles did not have the required hazardous waste marking/labeling information (**Photos 9-10**).

b. A 55-gallon drum of polishing dust/metal particles did not have the required hazardous waste marking/labeling information (**Photo 11**). According to facility representatives, this 55-gallon drum of polishing dust/metal particles resulted from the cleaning of the vacuum system when it was broken.

c. There were three, five-gallon containers of hazardous waste (electroless nickel) (**Photo 19**). One did not have hazardous waste markings or a label with the required information.

5. Failure to close hazardous waste containers being accumulated on-site as required by 22 CCR §§ 66262.34(a)(1)(A) and 66265.173(a) [40 CFR §§ 262.34(a)(1)(i) and 265.173(a)].

22 CCR § 66262.34 - Accumulation Time.
(a) Except as provided in subsections (c) and (d) of this section and section 66262.35, a generator may accumulate hazardous waste on-site for 90 days or less without a permit or grant of interim status, provided that:
(1)(A) the waste is placed in containers and the generator complies with the applicable requirements of articles 9, 27, 28 and 28.5 of chapter 15 of this division, or the waste is placed in tanks and the generator complies with articles 10, 27, 28, and 28.5 of chapter 15 of this division, except sections 66265.197(c) and 66265.200. In addition, such a generator is exempt from all the requirements in articles 7 and 8 of chapter 15 of this division, except for sections 66265.111 and 66265.114; or

22 CCR § 66265.173 - Management of Containers.
(a) A container holding hazardous waste shall always be closed during transfer and storage, except when it is necessary to add or remove waste.

Potential violations:

a. A three-quarter-filled Supersack of polishing dust/metal particles was open **(Photo 7)** but did have the required hazardous waste marking/labeling information **(Photo 8)**.

b. A quarter-filled Supersack of floor sweepings particles was open and did not have any of the required hazardous waste marking/labeling information **(Photos 9-10)**.

c. A 55-gallon drum of polishing dust/metal particles was not closed and did not have the required hazardous waste marking/labeling information **(Photo 11)**. According to facility representatives, this 55-gallon drum of polishing dust/metal particles resulted from the cleaning of the vacuum system when it was broken.

d. In the center of the paved area on a wood pallet were two, 15-gallon drums of RCRA hazardous waste/chrome solution (D002, D007, D008, CA code 726) which were correctly marked/labeled, but were not closed because the shrink wrap covering the tops of the drums would not prevent a spill if the containers fell or were tipped over **(Photos 12-13)**.

e. Along the fence bordering the north side of the paved area was one, 55-gallon drum of hazardous waste (brass stripper) which was correctly marked/labeled but was not closed (only shrink wrapped) and had exceeded the 90-day storage limit i.e., it had an accumulation start date of 7-23-03 **(Photos 17-18)** .

6. Failure to maintain adequate aisle space between containers of hazardous waste as required by 22 CCR §§ 66262.34(a)(4) and 66265.35 [40 CFR §§ 262.34(a)(4) and 265.35].

22 CCR § 66262.34 - Accumulation Time.
(a) Except as provided in subsections (c) and (d) of this section and section 66262.35, a generator may accumulate hazardous waste on-site for 90 days or less without a permit or grant of interim status, provided that:
(4) the generator complies with the requirements for owners or operators in articles 3 and 4 of chapter 15 of this division and with section 66265.16, and with section 66268.7(a)(5).

22 CCR § 66265.35 - Required Aisle Space.
The owner or operator shall maintain aisle space to allow the unobstructed movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment to any area of facility operation in an emergency, unless it can be demonstrated to the Department that aisle space is not needed for any of these purposes.

Potential violation: Hazardous wastes and reusable plating solutions were being stored along the fence bordering the north side of the paved area **(Photo 14)**. There was inadequate aisle space between the containers of hazardous waste.

7. Storage of hazardous waste without a permit in violation of 22 CCR §§ 66262.34(c) and 66270.1(c) [40 CFR §§ 262.34(b) and 270.1(c)].

22 CCR § 66262.34 - Accumulation Time.
(c) A generator who accumulates hazardous waste for more than 90 days is an operator of a storage facility and is subject to the requirements of chapters 14 and 15 of this division and the permit requirements of chapter 20 of this division, unless the generator has been granted an extension to the 90-day period or meets the requirements of subsection (d) or (e) of this section. An extension may be granted pursuant to

section 66262.35 if non-RCRA or RCRA exempt hazardous wastes must remain on-site for longer than 90 days due. An extension may be granted by the Department if RCRA hazardous wastes must remain onsite for longer than 90 days due to unforeseeable, temporary, and uncontrollable circumstances. An extension of up to 30 days for RCRA hazardous waste may be granted at the discretion of the Department on a case-by-case basis.

22 CCR § 66270.1 - Purpose and Scope of These Regulations.
(c) Scope of the Permit Requirements. A permit is required for the "transfer," "treatment," "storage," and "disposal" of any waste which is hazardous waste pursuant to section 66261.3. The terms "transfer," "treatment," "storage," "disposal," and "hazardous waste" are defined in section 66260.10. Owners and operators of hazardous waste management units shall have permits during the active life (including the closure period) of the unit. Owners or operators of surface impoundments, landfills, land treatment units, and waste pile units that received wastes after July 26, 1982, or that certified closure (according to section 66265.115) after January 26, 1983, shall have post-closure permits, unless they demonstrate closure by removal as provided under subsections (c)(5) and (6) of this section. If a post-closure permit is required, the permit shall address applicable chapter 14 Water Quality Monitoring, Environmental Monitoring, Corrective Action, and Post-closure Care Requirements of this division. The denial of a permit for the active life of a hazardous waste management facility or unit does not affect the requirement to obtain a post-closure permit under this section.

Potential violations: By the end of the inspection, the containers in **Photo 14** had been sorted to separate hazardous waste containers and containers of reusable plating solution, e.g., tin nickel and copper plating solutions **(Photos 15-16)**.

a. There was one, 55-gallon drum of hazardous waste (brass stripper) which was correctly marked/labeled but was not closed (only shrink wrapped) and had exceeded the 90-day storage limit i.e., it had an accumulation start date of 7-23-03 **(Photos 17-18)**.

b. There were three, five-gallon containers of hazardous waste (electroless nickel) **(Photo 19)**. One did not have hazardous waste markings or a label, and the two with labels exceeded the 90-day storage limit for large quantity generators, i.e., both had accumulation start dates of 5-6-03 **(Photo 20)**.

NON-RCRA POTENTIAL VIOLATIONS: None at this point.

ATTACHMENTS

1. Pages 3-7 through 3-9 of the facility's Hazardous Waste Management Plan
2. Site map of the facility
3. Photographs
4. Facility's hazardous waste inspection checklist for September 2003
5. 9-22-03 fax from the facility with 9-22-03 preliminary proposal by Dodge Concrete Surfaces to repair concrete floors in the containment area at the main shop with epoxy
6. Nov. 19, 2003 facility submittal of four hazardous waste manifests (22003060 - 22993063) for the shipment of RCRA and non-RCRA hazardous wastes from the facility and a photograph of the completed raw materials and hazardous waste storage shed

ATTACHMENT 1

Pages 3-7 through 3-9 of the facility's Hazardous Waste Management Plan

Attachment 1

Table IX - Solid Wastes Currently Generated at Cal-Tron Plating, Inc.

Solid Waste	Potential Hazardous Waste Parameter	Test Methods			Analysis Frequency
		Soluble Metals by TCLP	Total Metals for Comparison to TTLC	Soluble Metals for Comparison to STLC	
Waste nickel sulfamate solution	Nickel		EPA 6010	WET; EPA 6010	Annual
	pH	EPA 9040			
Waste nickel and tin solution	Nickel		EPA 6010	WET; EPA 6010	Annual
	pH	EPA 9040			
Post nickel plating rinses	Nickel		EPA 6010	WET; EPA 6010	Annual
	pH	EPA 9040			
Waste decorative chromium solution	Lead	EPA 3050; 6010	EPA 6010	WET; EPA 6010	Annual
	Hexavalent chromium		EPA 6010	WET; EPA 6010	
	Chromium	EPA 3050; 6010	EPA 6010	WET; EPA 6010	
	pH	EPA 9040			
Waste trivalent chromium solution	Chromium	EPA 3050; 6010	EPA 6010	WET; EPA 6010	Annual
	pH	EPA 9040			
Post chromium plating rinses	Lead	EPA 3050; 6010	EPA 6010	WET; EPA 6010	Annual
	Hexavalent chromium		EPA 6010	WET; EPA 6010	
	Chromium	EPA 3050; 6010	EPA 6010	WET; EPA 6010	
	pH	EPA 9040			
Waste copper-cyanide solution	EPA Listed waste F007. Analysis not required.				
Post copper-cyanide plating rinses	EPA Listed waste F007. Analysis not required.				
Waste 1,1,1-trichloroethane	EPA Listed Waste F001. Analysis not required.				
Waste acid copper solution	Copper		EPA 6010	WET; EPA 6010	Annual
	pH	EPA 9040			

Table IX - Solid Wastes Currently Generated at Cal-Tron Plating, Inc.

Solid Waste	Potential Hazardous Waste Parameter	Test Methods			Analysis Frequency
		Soluble Metals by TCLP	Total Metals for Comparison to TTLC	Soluble Metals for Comparison to STLC	
Post acid copper plating rinses	Copper		EPA 6010	WET; EPA 6010	Annual
	pH	EPA 9040			
Filter cake[1]	Copper		EPA 6010	WET; EPA 6010	Annual
	Hexavalent Chromium		EPA 6010	WET; EPA 6010	
	Chromium	EPA 3050; 6010	EPA 6010	WET; EPA 6010	
	Nickel		EPA 6010	WET; EPA 6010	
	Cyanide	EPA 9010	EPA 9010	WET; EPA 9010	
Waste oils and lubricants, and absorbent material containing oil	Waste oils and lubricants and absorbent material containing oil are regulated as hazardous wastes by the state of California. Analysis is not required.				

Note 1 - The receiving TSDF may require analysis of these waste streams.

Table X - Regulatory Limits

Constituent	TCLP (mg/l)	TTLC (mg/kg)	STLC (mg/l)	Conditionally Authorized
Hexavalent Chromium	5	500	5	750
Trivalent Chromium	5	2,500	5	1,400
Copper	---	2,500	25	1,400
Lead and Lead Compounds	5	1,000	5	1,400
Nickel	---	2,000	20	1,400
Corrosivity (pH)	<2.0 or >12.5			--

In order to determine if the waste is RCRA regulated, Non-RCRA regulated, or non-hazardous for metal content please follow the flow chart on the next page, left to right and line by line, using the information provided in **Table X.**

Chromium or Lead Content

>TCLP	**RCRA waste**		
<TCLP	>TTLC	**CA waste**	
<TCLP	<TTLC	(Note 1)	
<TCLP	<TTLC	>STLC	**CA waste**
<TCLP	<TTLC	<STLC	Non-hazardous

Note 1 - divide TTLC results by 10. If either of the resulting values is greater than the STLC value listed in **Table X**, then STLC must be performed. If the resulting value is less than the STLC value in **Table X**, then it is not a California-regulated waste.

Copper or Nickel Content

>TTLC	**CA waste**	
<TTLC	(2)	
<TTLC	>STLC	**CA waste**
<TTLC	<STLC	Non-hazardous

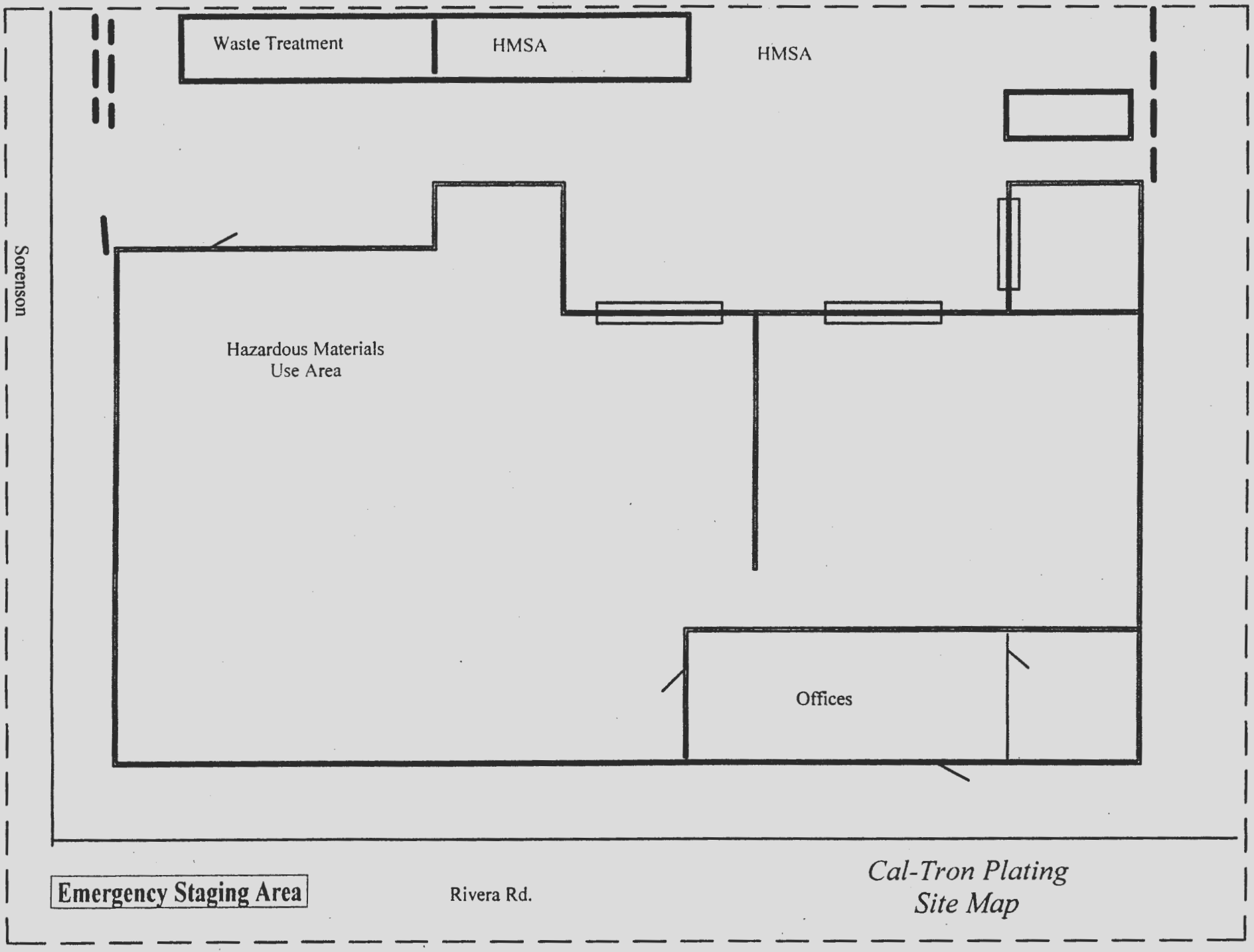
Note 2 - divide TTLC results by 10. If the resulting value is greater than the STLC value listed in **Table X**, then STLC must be performed. If the resulting value is less than the STLC value listed in **Table X**, then it is not a California-regulated waste.

Table XI - Sampling Procedures

Hazardous Waste	Sampling Procedure
Spent TCA	1. From the drum containing the spent TCA, pull a sample using a glass sampling tube. 2. Grab a minimum sample of 500 ml and place in a clean glass sampling jar. 3. Place plastic wrap over the top of the glass jar. 4. Seal the uar with the plastic screw-type lid. 5. Affix a label containing the company name, date, location of the sample, contents of the sample, sequential sample identification number, and initials of the sampler. 6. Place the sample in a small cooler filled with ice. 7. Convey the sample via chain-of-custody to the laboratory.

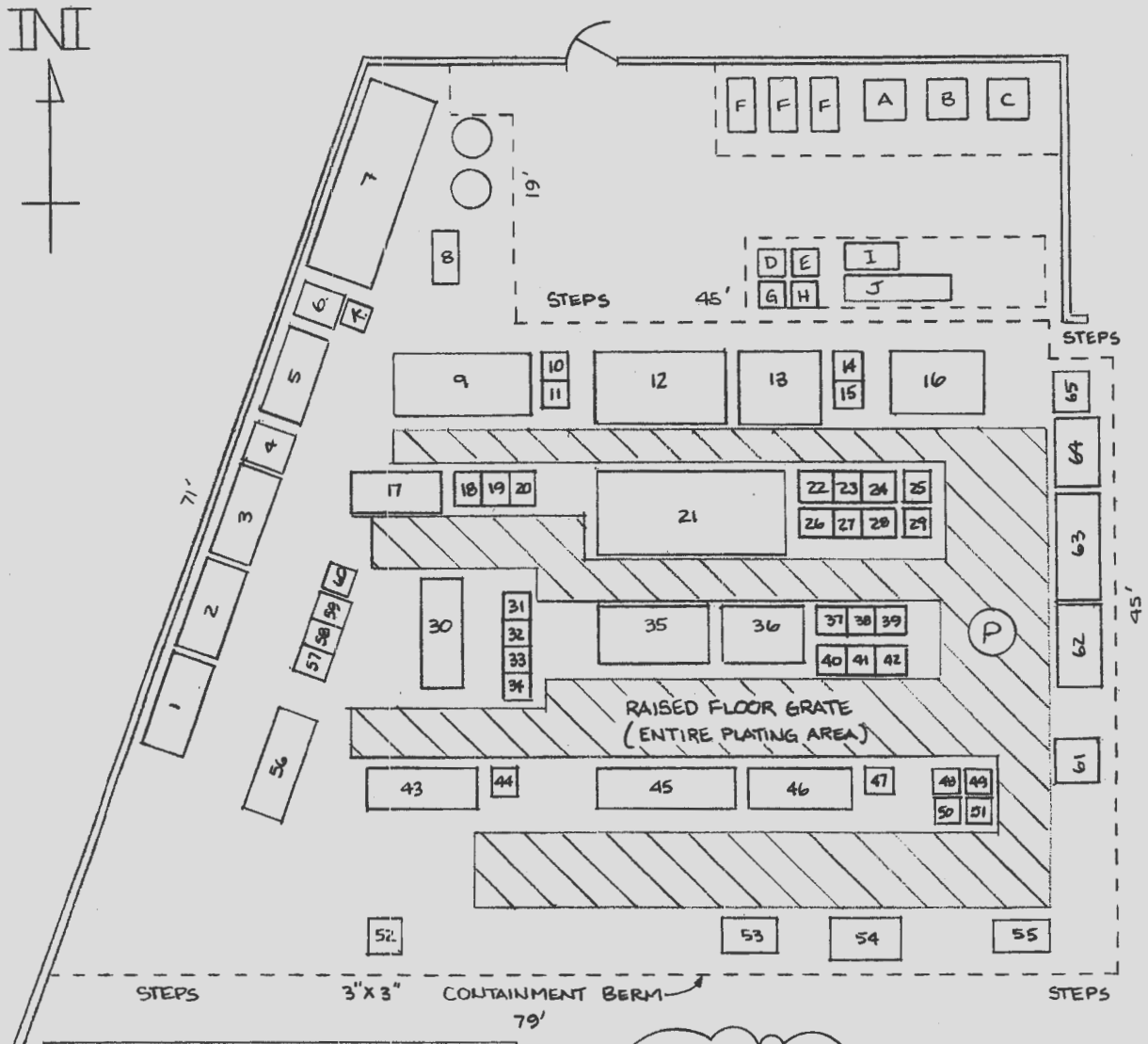
ATTACHMENT 2

Site map of the facility



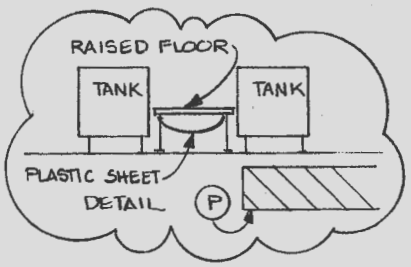
Cal-Tron Plating
Site Map

Attachment 2



SECONDARY TANK LIST		
D&E	ELECTROLESS Ni	125 GAL.
G&H	" "	200 GAL.
C	PROPRITARY Ni STRIPPER	
B	" " "	
A	BRASS STRIPPER	
I	GOLD	55 GAL.
J	BLACK CHROME	200 GAL.
K	BLACK Ni	100 GAL.
F	PLATING FILTERS	

NOTE: ALL RINSE TANKS ARE HARD PIPED TO TREATMENT TANK T-9



DETAIL (P) NOTES: PLASTIC SHEETING LOCATED BETWEEN TANKS COLLECT DRIPPAGE FROM PARTS. SHEETING DRAINS TO COLLECTION AREAS, THEN TO TREATMENT.

ATTACHMENT 3

Photographs

Photo 1 - Chrome plating line

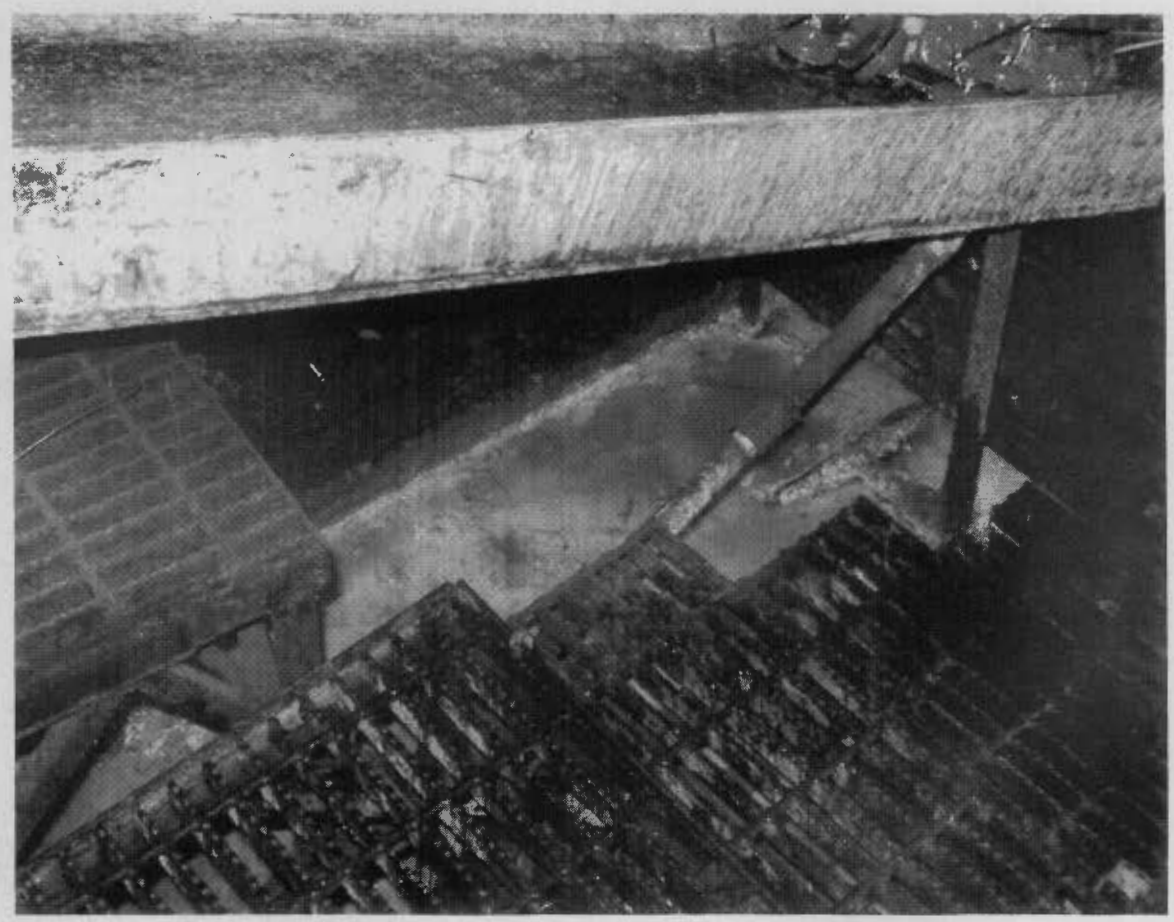


Photo 2 - Southeast corner of plating area floor with epoxy coating

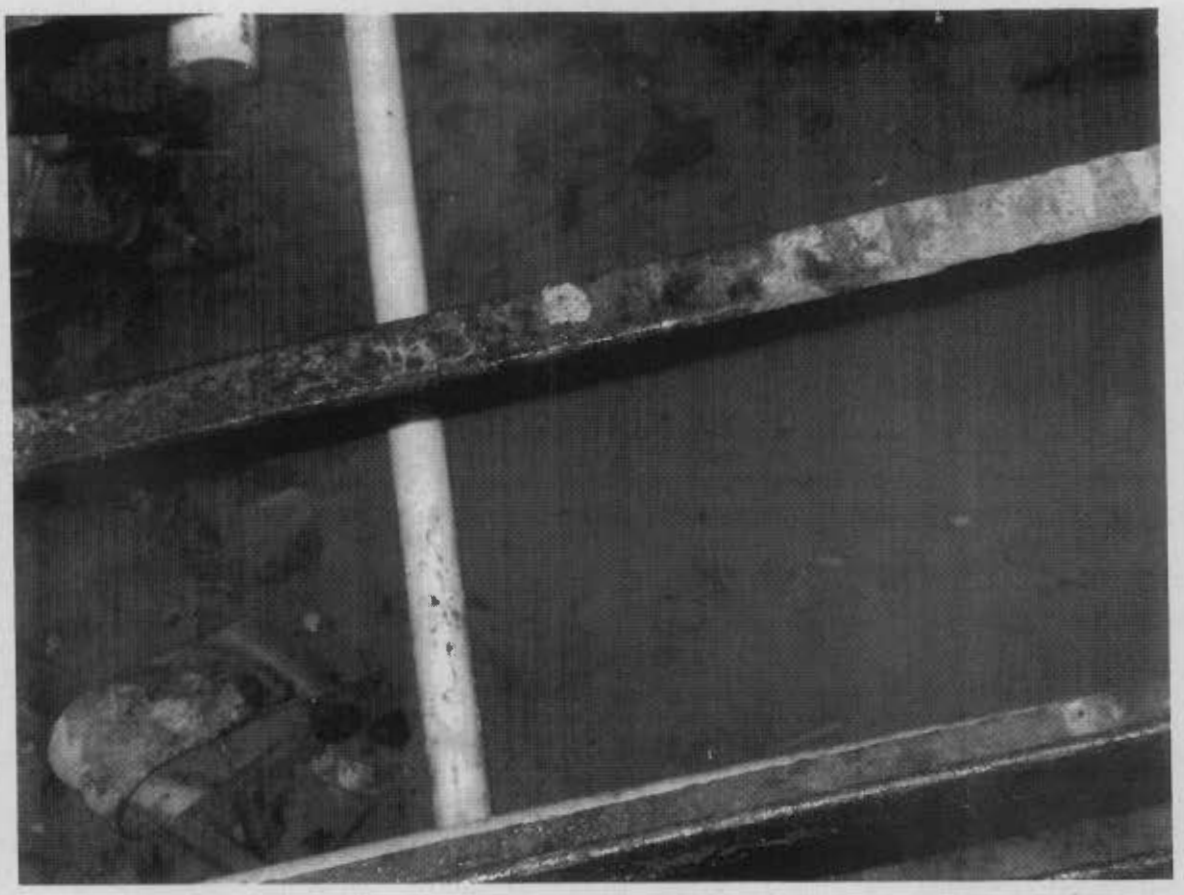


Photo 3 - Another view of plating area floor with epoxy coating, near tanks 61-65 on the east side of the plating area

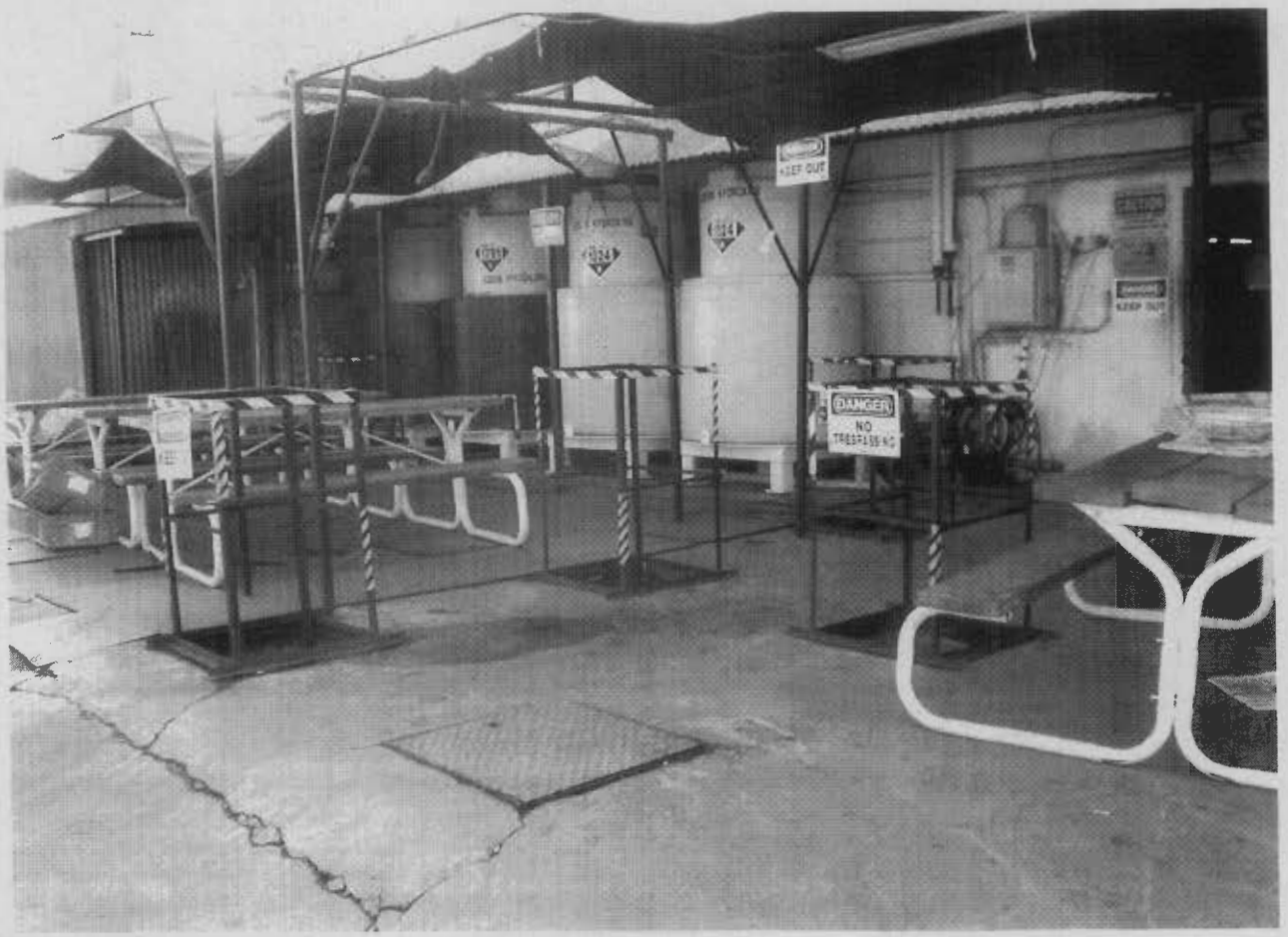


Photo 4 -Underground treatment tanks and and aboveground chemical storage tanks of the wastewater treatment plant

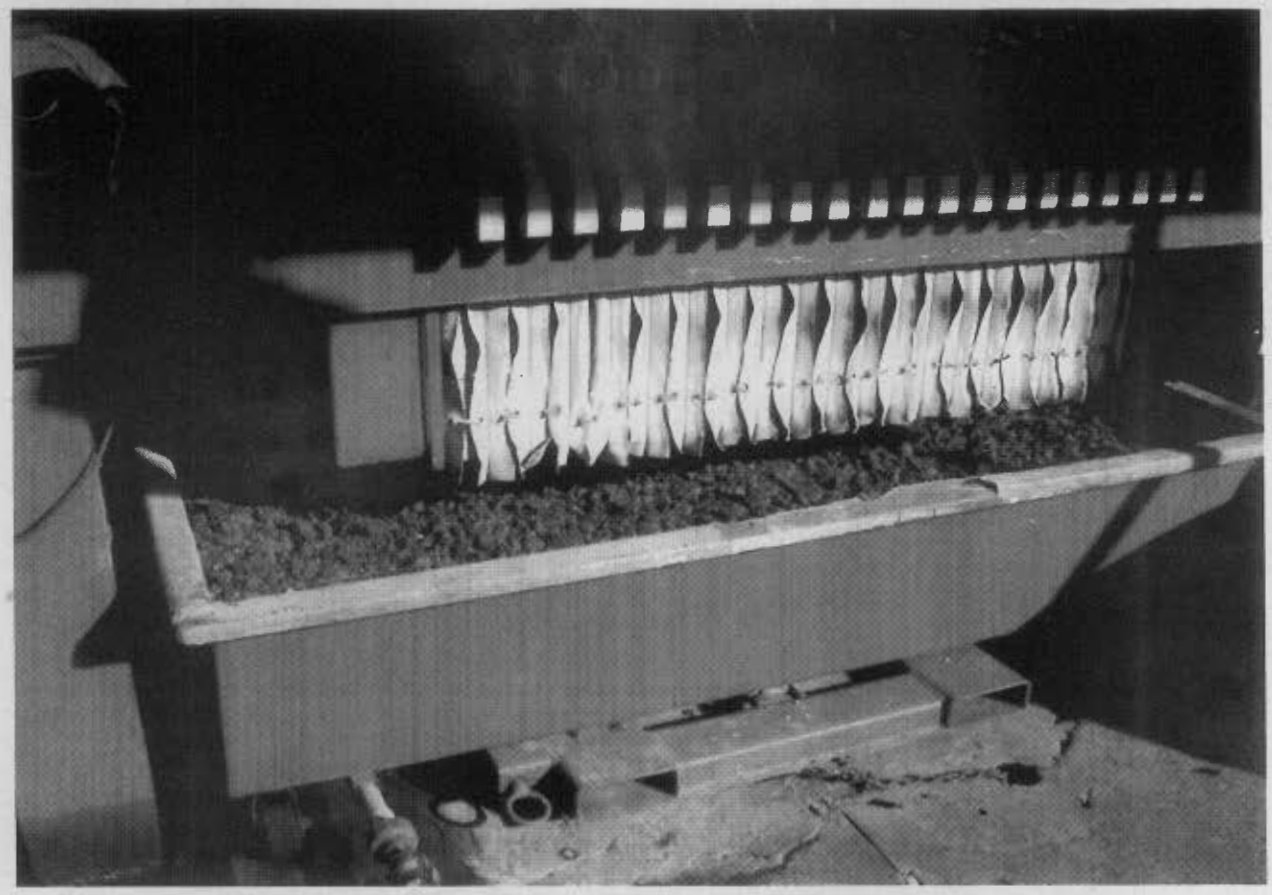


Photo 5 - Sludge filter press and open, unmarked/unlabeled container of sludge (F006)

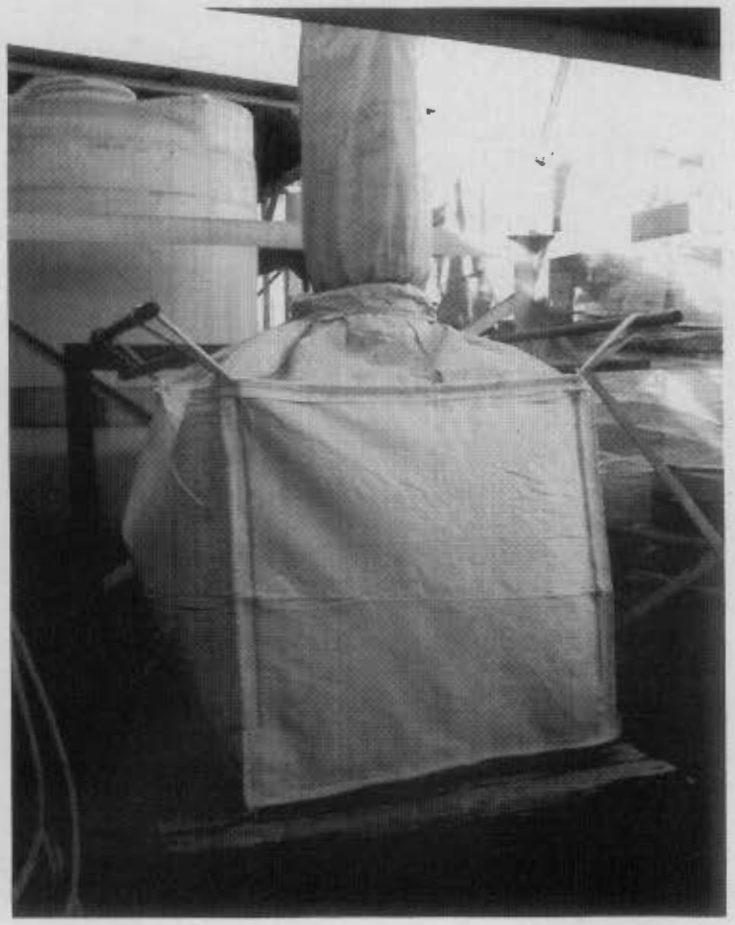


Photo 6 - Supersack attached to polishing area vacuum system

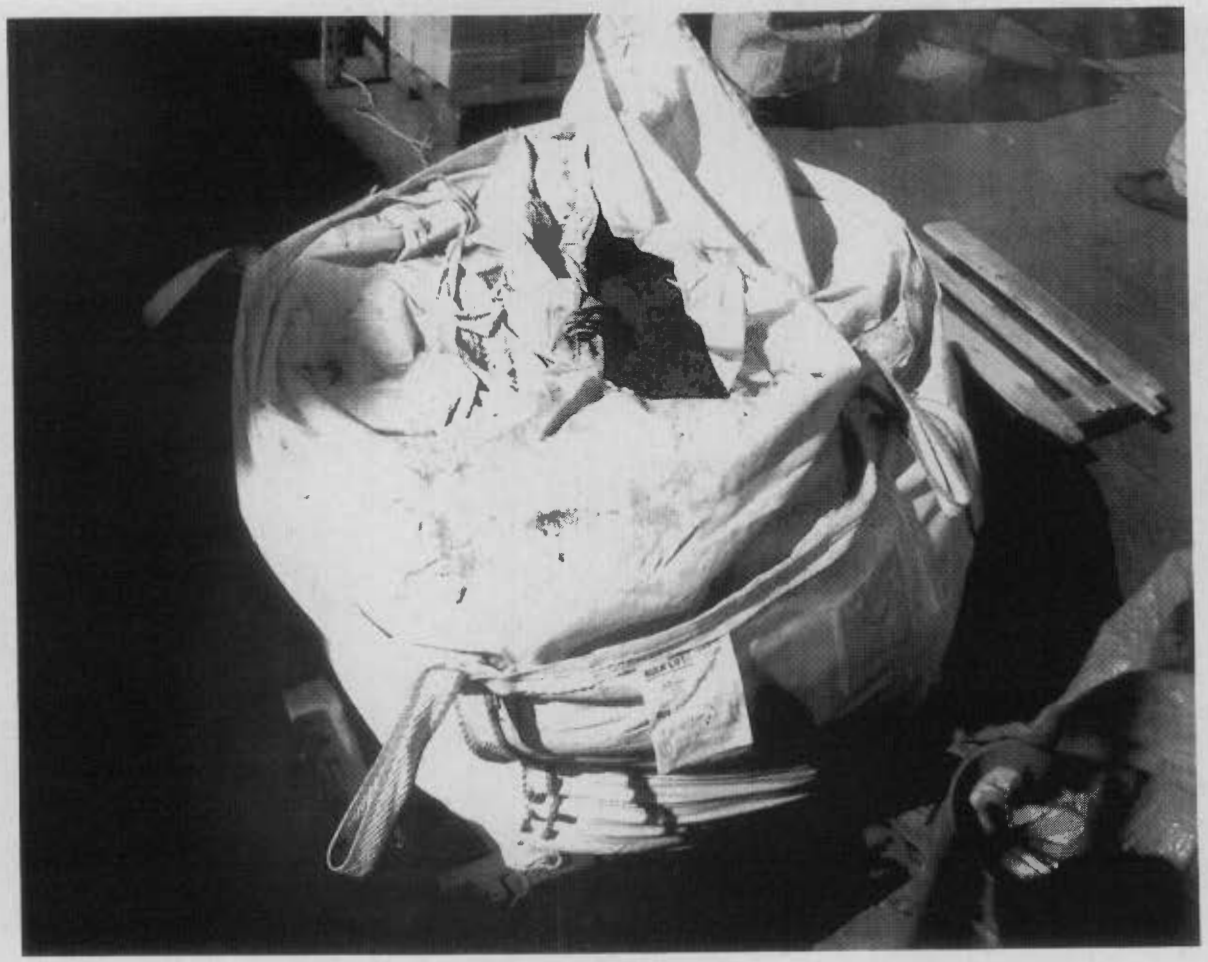


Photo 7 - Open Supersack of non-RCRA hazardous waste (CA code 181)

Photo 8 - Hazardous waste label on Supersack in Photo 7

Photo 9 - Open, unmarked/unlabeled Supersack of floor sweepings

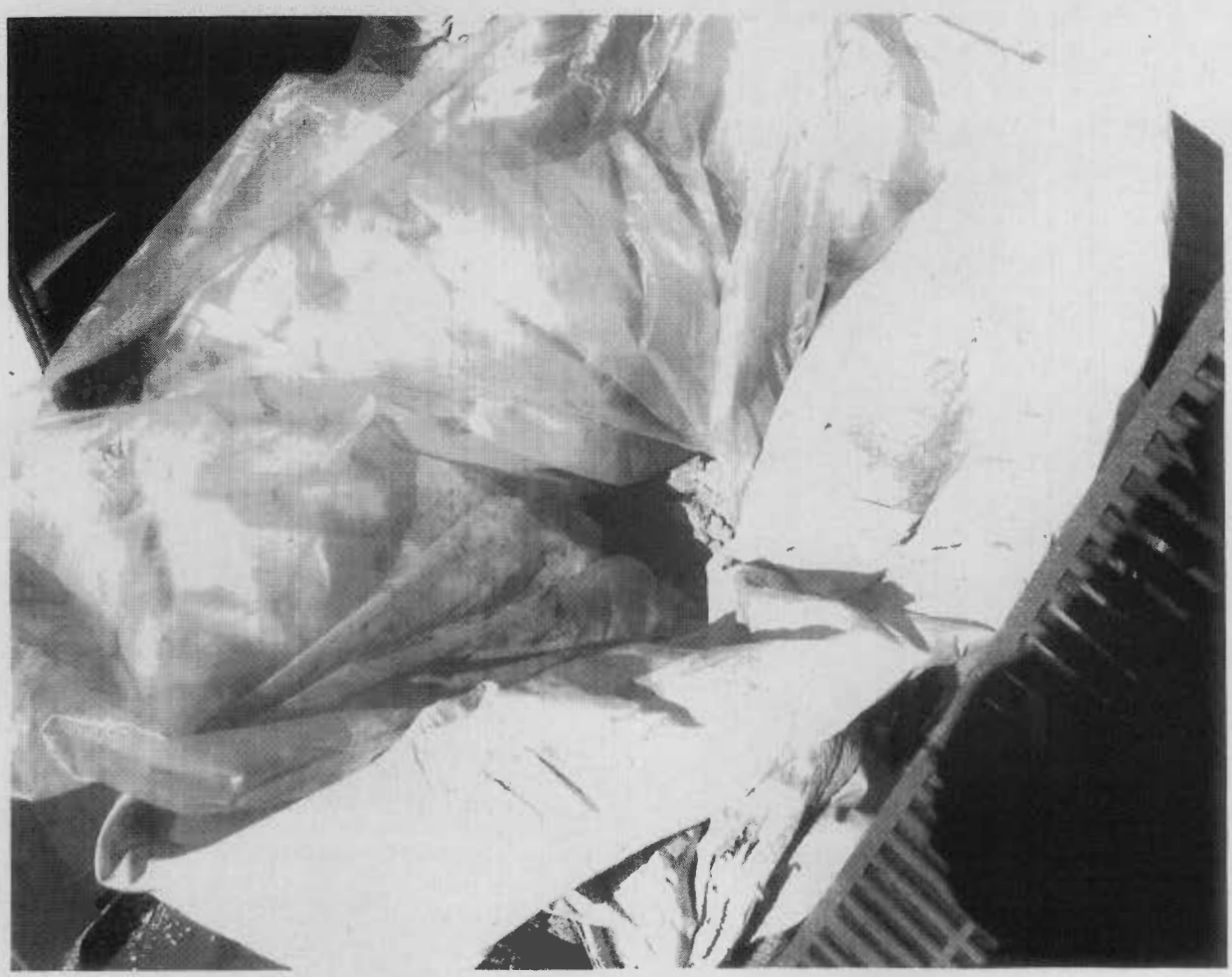


Photo 10 - Open top of Supersack in Photo 9

Photo 11 - Open, unmarked/unlabeled 55-gallon drum of hazardous waste (CA code 181) from cleaning the vacuum system

Photo 12 - Two, 15-gallon containers of RCRA HW/chrome solution (D002, D007, D008, CA code 726)

Photo 13 - Shrink wrappred top of open container in Photo 12

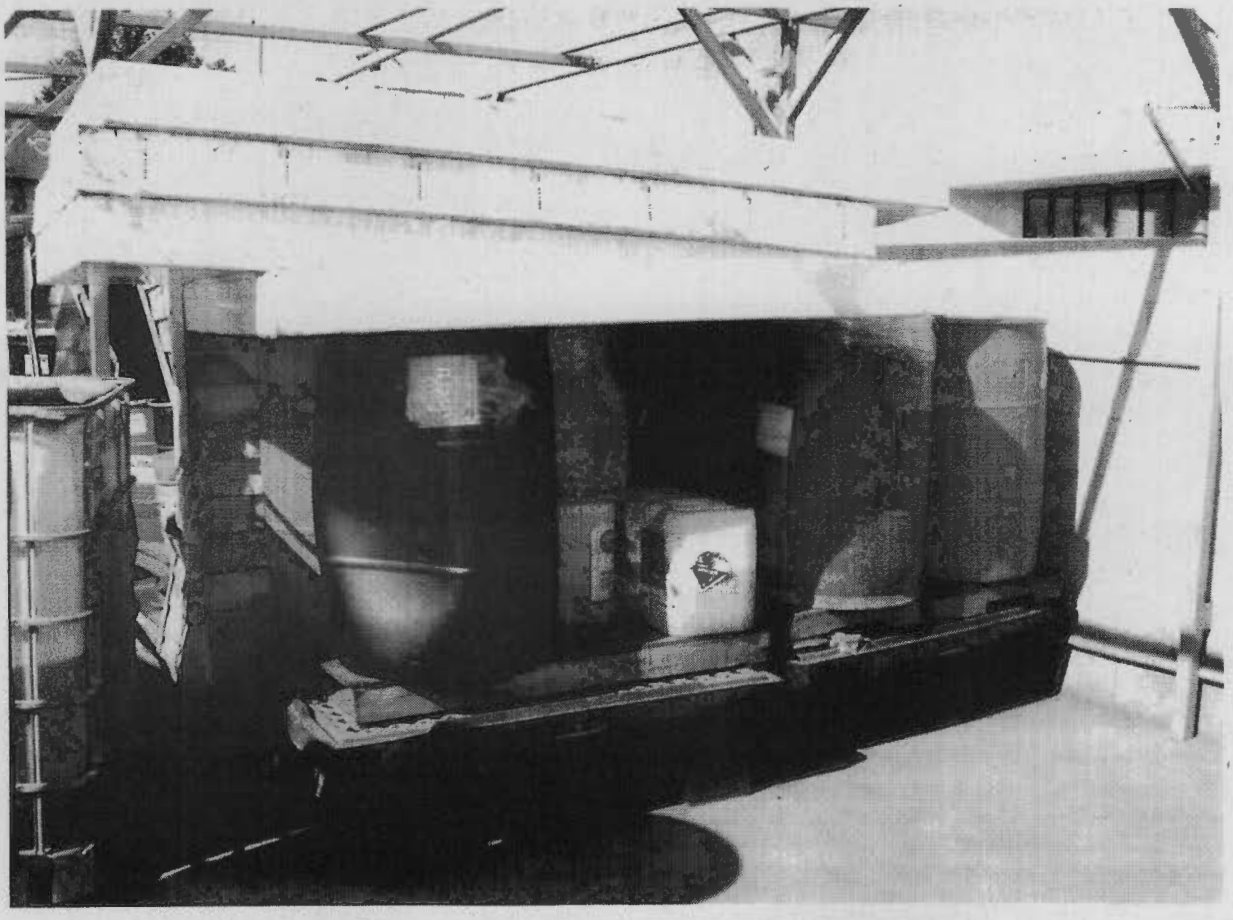


Photo 14 - Containers of hazardous waste and reusable plating solutions along north fence

Photo 15 - Containers in paved area behind main building after being moved and relabeled

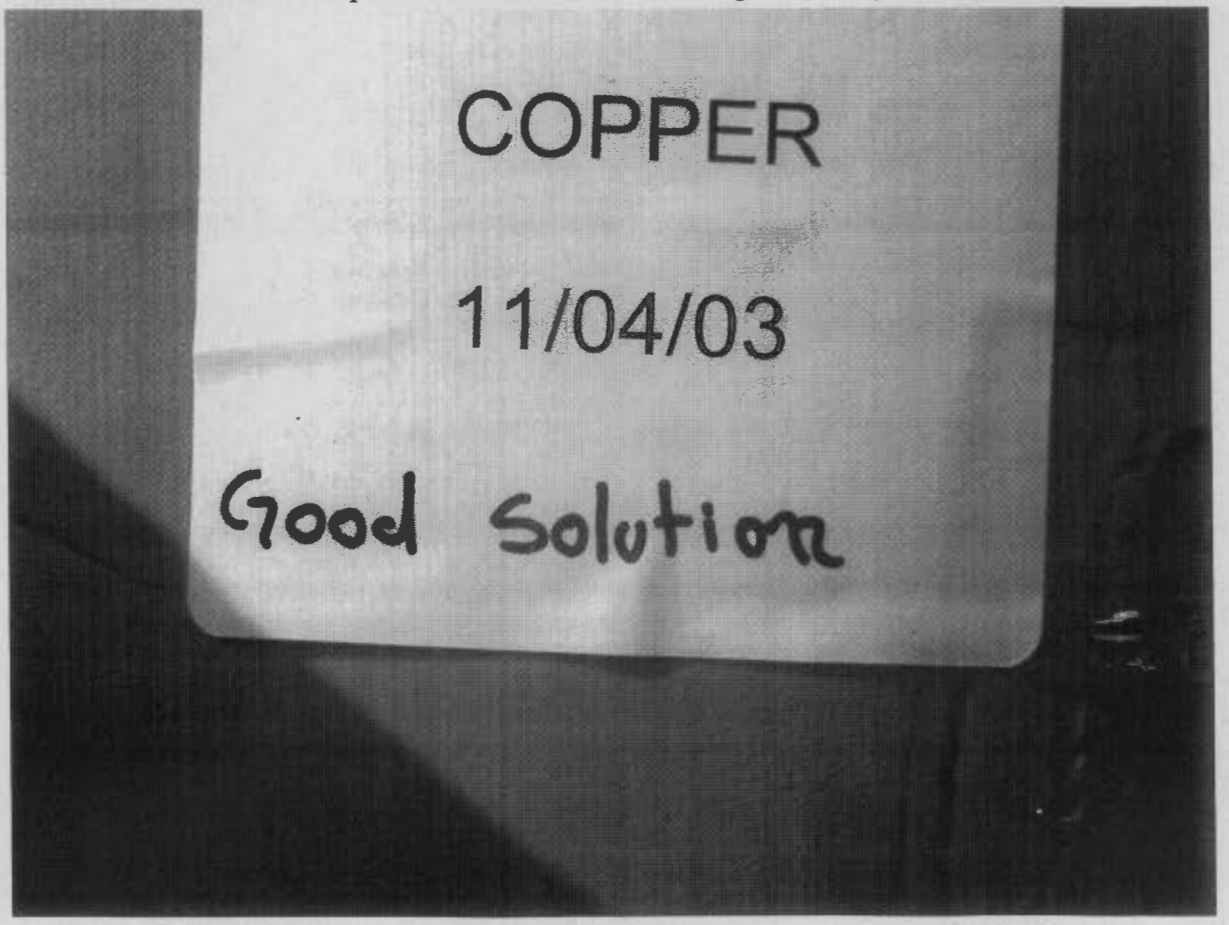


Photo 16 - One container of reusable copper plating solution in Photo 15

Photo 17 - Open (shrink wrapped) 55-gallon drum of brass stripper solution along north fence

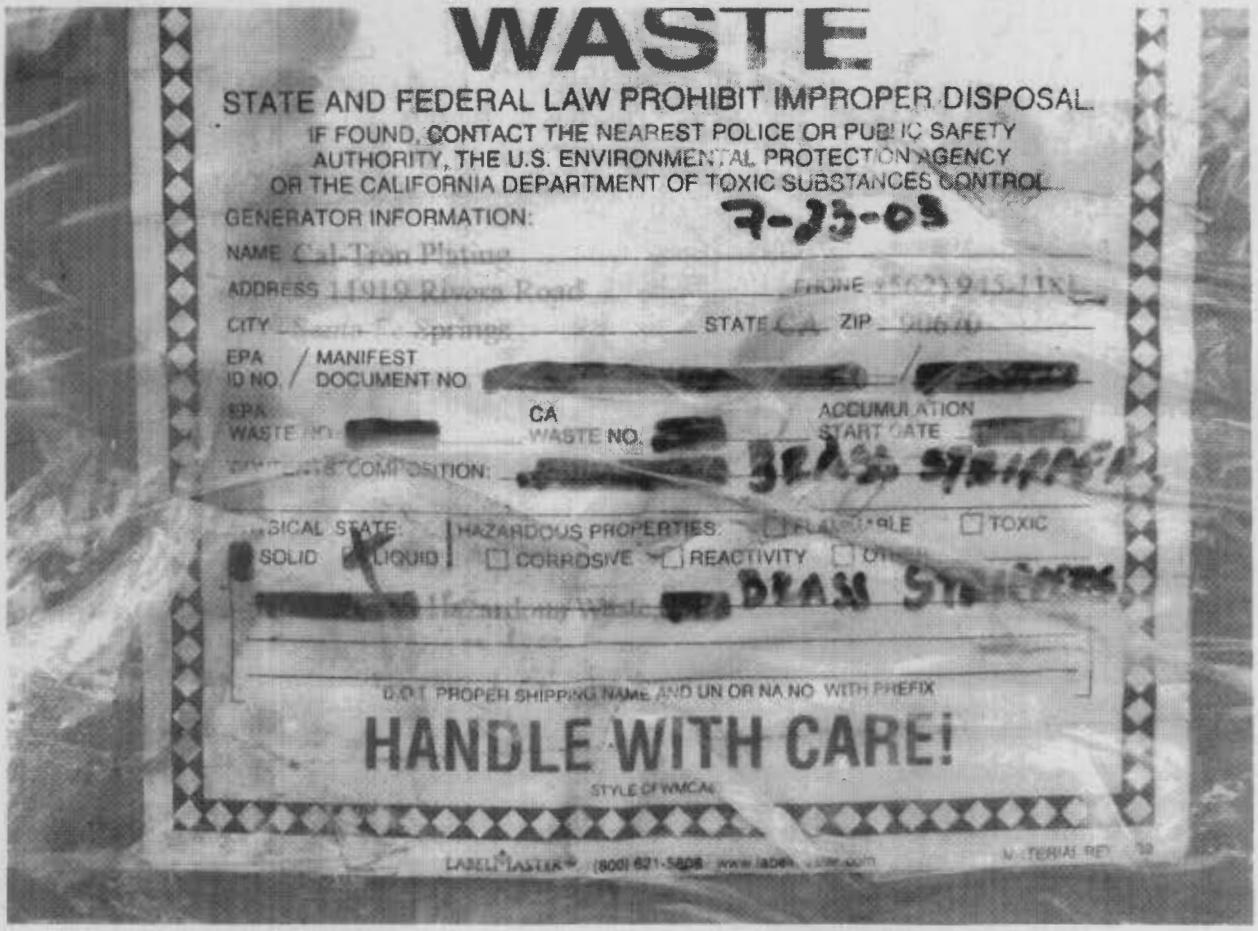


Photo 18 - Label with an accumulation start date of 7-23-03 on the 55-gallon drum in Photo 17

Photo 19 - three, 5-gallon containers of electroless nickel plating solution

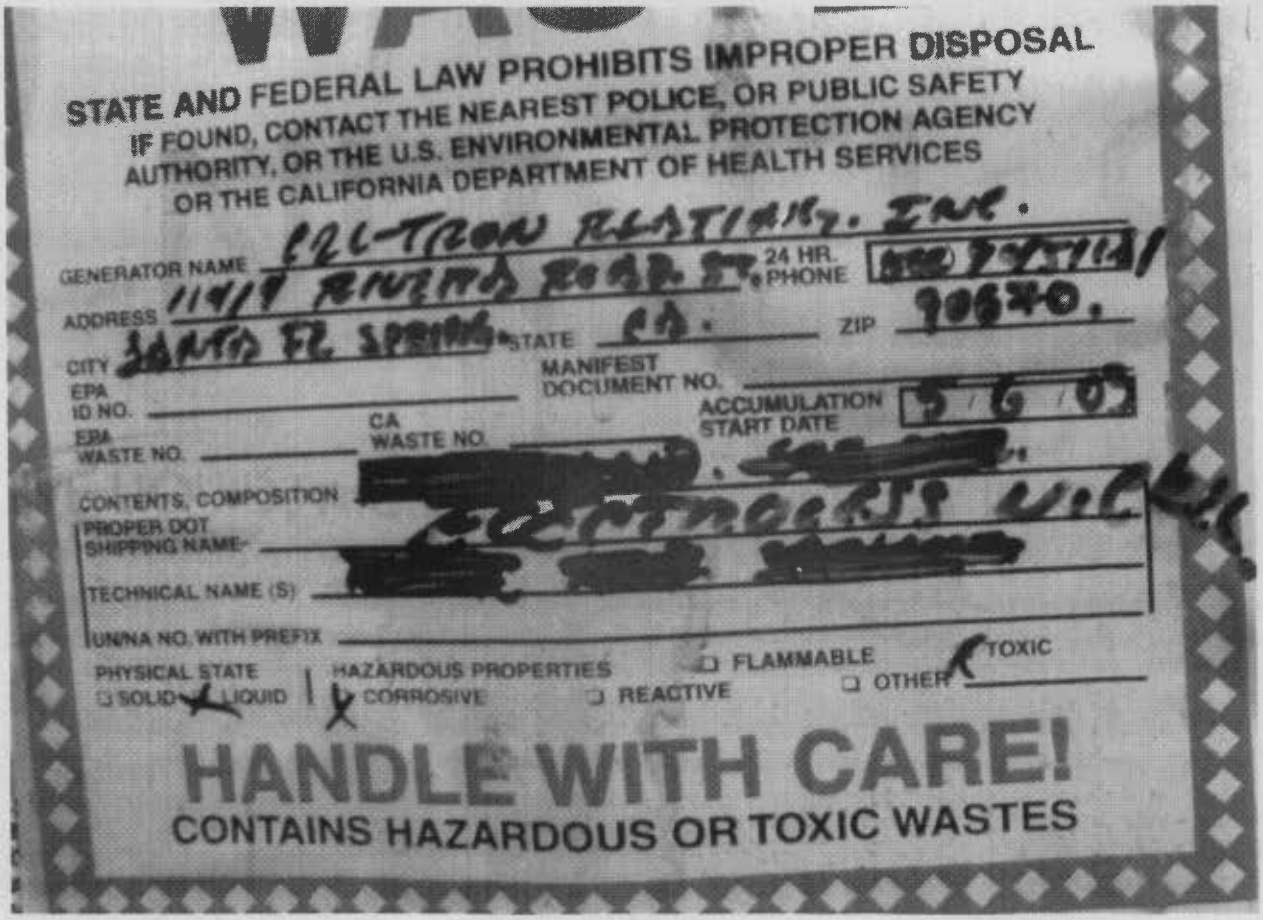


Photo 20 - Closeup of one of the two labels in Photo 19, showing an accumulation start date of 5-6-03

ATTACHMENT 4

Facility's hazardous waste inspection checklist for September 2003

BAUTISTA, JESUS

Attachment 4

HAZARDOUS WASTE MANAGEMENT --- RECORD OF STORAGE INSPECTION

MONTH: SEPTEMBER YEAR: 2003.

✔ Acceptable ✖ Problem

ITEM	[redacted]	2	3	4	5	[redacted]		8	9	10	11	12	[redacted]		15
Storage Containers Condition		✓	✓	✓	✓			✓	✓	✓	✓	✓			✓
Containers Closed		✓	✓	✓	✓			✓	✓	✓	✓	✓			✓
Container Labeling		✓	✓	✓	✓			✓	✓	✓	✓	✓			✓
Storage Time Limit		✓	✓	✓	✓			✓	✓	✓	✓	✓			✓
Storage Tank Condition		✓	✓	✓	✓			✓	✓	✓	✓	✓			✓
Tank Operating System		✓	✓	✓	✓			✓	✓	✓	✓	✓			✓
Secondary Containment	DAY	✓	✓	✓	✓	SATURDAY	SUNDAY	✓	✓	✓	✓	✓	SATURDAY	SUNDAY	✓
Spill Response Equip.		✓	✓	✓	✓			✓	✓	✓	✓	✓			✓
Personal Protective Equi.	LABOR	✓	✓	✓	✓			✓	✓	✓	✓	✓			✓
Communication System		✓	✓	✓	✓			✓	✓	✓	✓	✓			✓
Storage Security		✓	✓	✓	✓			✓	✓	✓	✓	✓			✓
Warning Signs		✓	✓	✓	✓			✓	✓	✓	✓	✓			✓
Inspected By:		JB	JB	JB	JB			JB	JB	JB	JB	JB			JB

Item	16	17	18	19	[redacted]		22	23	24	25	26	[redacted]		29	30	31
Storage Containers Condition	✓	✓	✓	✓			✓	✓	✓	✓	✓			✓	✓	
Containers Closed	✓	✓	✓	✓			✓	✓	✓	✓	✓	SATURDAY		✓	✓	
Container Labeling	✓	✓	✓	✓	SATURDAY		✓	✓	✓	✓	✓			✓	✓	
Storage Time Limit	✓	✓	✓	✓		SUNDAY	✓	✓	✓	✓	✓		SUNDAY	✓	✓	
Storage Tank Condition	✓	✓	✓	✓			✓	✓	✓	✓	✓			✓	✓	
Tank Operating System	✓	✓	✓	✓			✓	✓	✓	✓	✓			✓	✓	
Secondary Containment	✓	✓	✓	✓			✓	✓	✓	✓	✓			✓	✓	
Spill Response Equip.	✓	✓	✓	✓			✓	✓	✓	✓	✓			✓	✓	
Personal Protective Equi.	✓	✓	✓	✓			✓	✓	✓	✓	✓			✓	✓	
Communication System	✓	✓	✓	✓			✓	✓	✓	✓	✓			✓	✓	
Storage Security	✓	✓	✓	✓			✓	✓	✓	✓	✓			✓	✓	
Warning Signs	✓	✓	✓	✓			✓	✓	✓	✓	✓			✓	✓	
Inspected By:	JB	JB	JB	JB			JB	JB	JB	JB	JB			JB	JB	

DOCUMENT ALL PROBLEMS ON BACK

ATTACHMENT 5

9-22-03 fax from the facility with 9-22-03 preliminary proposal by Dodge Concrete Surfaces to repair concrete floors in the containment area at the main shop with epoxy

Attachment 5

CONCRETE STRUCTURAL RESTORATION

WATERPROOFING

CALIF. LIC. #434800

CORROSION & ABRASION RESISTANT FLOOR RESURFACING

CONCRETE REPAIRS

Dodge
Concrete Surfaces

ARTHUR B. DODGE
15791 WILLETT LANE
HUNTINGTON BEACH, CA 92647
(714) 893-4992

FAX (714) 895-5524

FAX MEMO

DATE: 9-22-03

NAME: CARL

FIRM: CAL-TRON

WE ARE TRANSMITTING 2 PAGE(S) INCLUDING THIS COVER SHEET. IF YOU DID NOT RECEIVE ALL PAGES, PLEASE CALL AS SOON AS POSSIBLE.

CONCRETE STRUCTURAL RESTORATION

WATERPROOFING

CALIF. LIC. #434800

CORROSION & ABRASION RESISTANT FLOOR RESURFACING

CONCRETE REPAIRS

ARTHUR B. DODGE
15791 ~~[illegible]~~ WILLETT LANE
HUNTINGTON BEACH, CA 92647
(714) 893-4992

Dodge
Concrete Surfaces

PROPOSAL AND CONTRACT

TO Cal-Tron Plating Inc. DATE 09/22/03 JOB

P. O. ADDRESS 11919 Riviera Road, Santa Fe Springs, CA 90670 TELEPHONE 562-945-1181
FAX 562-693-5086

JOB ADDRESS same LOT BLK TRACT

OWNER ARCHITECT

THIS PROPOSAL IS VOID UNLESS ACCEPTED WITHIN THIRTY DAYS

We propose to furnish all material and labor necessary to perform the following:

Repair concrete floors in containment area at main shop with Arizona Polymers Novalac 88 Epoxy System. Work to take place 1st week in November, 2003. Estimate to follow this proposal.

ALL OF THE ABOVE WORK TO BE COMPLETED IN A SUBSTANTIAL AND WORKMANLIKE MANNER FOR THE sum of Dollars ($).

Payable

The entire amount of contract to be paid within days after completion. Any addition, alteration or deviation from the above specifications will become an extra charge over the sum mentioned in this contract and owner shall pay for same weekly as such additional work, alteration or deviation progresses.

Respectfully submitted,

By
CONTRACTOR

You are authorized to furnish all materials and labor required to complete the work mentioned in the above proposal, for which agree to pay the amount in said proposal, and according to the terms thereof. I have read the conditions of proposal and contract on the reverse side hereof and agree to same.

ACCEPTED -

Date , 19

DISTRIBUTION: WHITE—Contractor / CANARY—Customer / PINK—Return with Remittance

ATTACHMENT 6

Nov. 19, 2003 facility submittal of four hazardous waste manifests (22003060 - 22993063) for the shipment of RCRA and non-RCRA hazardous wastes from the facility and a photograph of the completed raw materials and hazardous waste storage shed

CALTRON PLATING
11919 RIVERA ROAD
SANTA FE SPRINGS, CA. 90670

CERTIFIED MAIL

7001 2510 0009 1860 2482

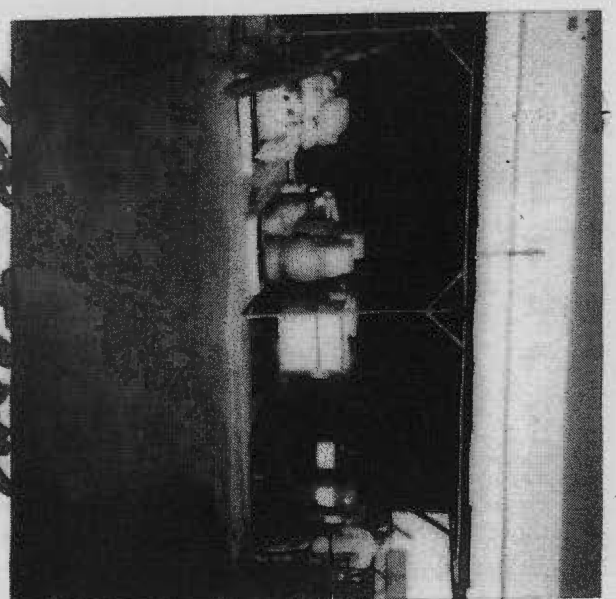
SANTA FE SPRINGS CA NOV.19.03

U.S. POSTAGE 04.42
0000000707
POSTALIA 263510

Ronald Brown
EPA Waste Management Div.
USEPA, Region 9
75 Hawthorn street
San Francisco, Ca 94105-3901

94105+3901

11-18-03



Attachment 6

State of California—Environmental Protection Agency
Form Approved OMB No. 2050-0039 (Expires 9-30-99)
Please print or type. *Form designed for use on elite (12-pitch) typewriter.*

See Instructions on back of page 6.

Department of Toxic Substances Control
Sacramento, California

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. CAD008237950 Manifest Document No. 130600 2. Page 1 of 1

Information in the shaded areas is not required by Federal law.

GENERATOR

3. Generator's Name and Mailing Address
Cal-Iron Plating
11919 Rivera Road, Santa Fe Springs, CA. 90670
4. Generator's Phone (562)945-1181 POC: Carl Troncale

A. State Manifest Document Number 22993060
B. State Generator's ID

5. Transporter 1 Company Name: Environmetal Resurce Transportation
6. US EPA ID Number: CAR000108209
C. State Transporter's ID [Reserved.]
D. Transporter's Phone (619) 661-4503

7. Transporter 2 Company Name
8. US EPA ID Number
E. State Transporter's ID [Reserved.]
F. Transporter's Phone

9. Designated Facility Name and Site Address
Phibro-Tech, Inc.
8851 Dice Road
Santa Fe Springs, CA 90670
10. US EPA ID Number: CAD008488025
G. State Facility's ID
H. Facility's Phone (562) 698-8036

11. US DOT Description (including Proper Shipping Name, Hazard Class, and ID Number)	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste Number
a. "RQ" Waste Corrosive liquid,acidic,inorganic,n.o.s., 8, UN3264,III (D002) (Sulfuric acid)	001	DF	00050	G	State 792 EPA/Other D002
b. Stripping Solution, NON RCRA Hazardous waste,liquid	010	DF	00500	G	State 135 EPA/Other NONE
c. Sodium nitrate solution,NON RCRA Hazardous waste,liquid	007	DF	00350	G	State 726 EPA/Other NONE
d. NON RCRA Hazardous waste,liquid	001	DF	00050	G	State 726 EPA/Other NONE

J. Additional Descriptions for Materials Listed Above
Approval # a. 20020407BA
b. 20020405J
c.
d.

K. Handling Codes for Wastes Listed Above
a. b. c. d.

15. Special Handling Instructions and Additional Information
24 hours emergency # (619) 661-4503
Please bill to. RRD Environmental Services
19629, Alida Avenue, Cerritos, CA 90703
Phone: (562) 843 3154

16. **GENERATOR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations.

If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

Printed/Typed Name	Signature	Month	Day	Year
C. Wesley McPhaters	C. Wesley McPhaters	11	13	03

TRANSPORTER

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Month	Day	Year
[illegible]	[signature]	11	13	03

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Month	Day	Year

FACILITY

19. Discrepancy Indication Space

20. Facility Owner or Operator Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.

Printed/Typed Name	Signature	Month	Day	Year

IN CASE OF EMERGENCY OR SPILL, CALL THE NATIONAL RESPONSE CENTER 1-800-424-8802. WITHIN CALIFORNIA, CALL 1-800-852-7550

DO NOT WRITE BELOW THIS LINE.

DTSC 8022A (1/99)
EPA 8700-22

Yellow: GENERATOR RETAINS

ate of California—Environmental Protection Agency
rm Approved OMB No. 2050-0039 (Expires 9-30-99)
ease print or type Form designed for use on elite (12-pitch) typewriter.

See Instructions on back of page 6.

Department of Toxic Substances Control
Sacramento, California

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No.	Manifest Document No.	2. Page 1 of 1	Information in the shaded areas is not required by Federal law.
CAD008237950	93061		

GENERATOR

3. Generator's Name and Mailing Address
Cal-Iron Plating
11919 Rivera Road., Santa Fe Springs, CA 90670
4 Generator's Phone ((562) 945-1181 POC: Carl Troncale

A. State Manifest Document Number: 2293061
B. State Generator's ID:

5 Transporter 1 Company Name: Environmental Resource Transportation
6. US EPA ID Number: CAR000108209
C. State Transporter's ID [Reserved.]
D. Transporter's Phone: (619) 661-4503

7 Transporter 2 Company Name:
8. US EPA ID Number:
E. State Transporter's ID [Reserved.]
F. Transporter's Phone:

9 Designated Facility Name and Site Address: US Ecology, Inc
12 Miles South of highway 95
Beatty, NV 89003
10. US EPA ID Number: NVT330010000
G. State Facility's ID:
H. Facility's Phone: (800) 239-3943

11. US DOT Description (including Proper Shipping Name, Hazard Class, and ID Number)	12. Containers No.	12. Containers Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste Number
a "RQ" Hazardous waste solid,n.o.s.,9,NA3077,III (F006,D007) (Filtercake)	003	BA	00003	Y	State 181 EPA/Other F006,D007
b "RQ" Hazardous waste solid,n.o.s.,9,NA3077,III (D001,D005,D006,D007,D008,D010,D011))	001	DM	00400 01200	P	State 181 EPA/Other D006,D007
c Sludge, "RQ" Waste Corrosive solid,acidic,inorganic,n.o.s.,8, UN3260,III (D007) (Chromic acid)	001	DM	00400	P	State 181 EPA/Other D007
d Polishing Dust, NON RCRA Hazardous Waste,Solid	001	BA	99999	Y	State 181 EPA/Other NONE

J. Additional Descriptions for Materials Listed Above
Approval #: Ha 07-012 Filtercake
Hb 07-012-7340 Floorsweep
Hc Sludge with Chrome
Hd 0-012-7221 Polishing Dust

K. Handling Codes for Wastes Listed Above
a. b.
c. d.

15 Special Handling Instructions and Additional Information
(DOT) Ha EPA
Hb EPA
Hc EPA
Hd EPA
24 hours emergency #: (619) 661-4503
Please bill to RRD Environmental Services
19629, Alida Avenue, Cerritos, CA 90703
Phone (562) 843 3154

16 **GENERATOR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations.

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Printed/Typed Name	Signature	Month	Day	Year
SHIRLEY MORALES	Shirley Morales	11	13	03

TRANSPORTER

17 Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Month	Day	Year
[illegible]		11	13	03

18 Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Month	Day	Year

FACILITY

19 Discrepancy Indication Space

20 Facility Owner or Operator Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.

Printed/Typed Name	Signature	Month	Day	Year

IN CASE OF EMERGENCY OR SPILL, CALL THE NATIONAL RESPONSE CENTER 1-800-424-8802. WITHIN SOUTH DAKOTA, CALL THE DIVISION OF EMERGENCY MANAGEMENT.

DO NOT WRITE BELOW THIS LINE.

DTSC 8022A (1/99)
EPA 8700—22

Yellow: GENERATOR RETAINS

e of California—Environmental Protection Agency
n Approved OMB No 2050-0039 (Expires 9-30-99)
se print or type Form designed for use on elite (12-pitch) typewriter.

See Instructions on back of page 6.

Department of Toxic Substances Control
Sacramento, California

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No.	Manifest Document No.	2. Page 1 of 1	Information in the shaded areas is not required by Federal law.
CAT080823795	09306 2		

GENERATOR

3. Generator's Name and Mailing Address
Cal-Iron Plating
11919 Rivera Road, Santa Fe Springs, CA 90670
4. Generator's Phone (562) 945-1181 POC: Carl Troncale

A. State Manifest Document Number: 22993062
B. State Generator's ID:

5. Transporter 1 Company Name: Environmental Resource Transportation
6. US EPA ID Number: CAR000108209
C. State Transporter's ID [Reserved.]
D. Transporter's Phone: (619) 661-4503

7. Transporter 2 Company Name:
8. US EPA ID Number:
E. State Transporter's ID [Reserved.]
F. Transporter's Phone:

9. Designated Facility Name and Site Address
DK Environmental
3650 E. 26th Street
Los Angeles, CA 90023
10. US EPA ID Number: CAT080033681
G. State Facility's ID:
H. Facility's Phone: (323) 268-5056

11. US DOT Description (including Proper Shipping Name, Hazard Class, and ID Number)	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste Number
a. "RQ" Waste Chromic acid solution, 8, UN1755, II (D002, D007)	001	4-DF	902.00	G	State: 723 EPA/Other: D002, D007, D008
b.					State: EPA/Other:
c.					State: EPA/Other:
d.					State: EPA/Other:

J. Additional Descriptions for Materials Listed Above
Approval # 11-3(0012-A)
b.
c.
d.

K. Handling Codes for Wastes Listed Above
a.
b.
c.
d.

15. Special Handling Instructions and Additional Information
24 hours emergency # (619) 661-1503
Please bill to: RRD Environmental Services
19629 Alida Avenue, Cerritos, CA 90703
Phone (562) 843 3154

16 **GENERATOR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations.

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Printed/Typed Name	Signature	Month	Day	Year
BERLY MORALES	Berly Morales	11	13	93

TRANSPORTER

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Month	Day	Year
[illegible]		11	13	93

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Month	Day	Year

FACILITY

19. Discrepancy Indication Space

20. Facility Owner or Operator Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.

Printed/Typed Name	Signature	Month	Day	Year

IN CASE OF EMERGENCY OR SPILL, CALL THE NATIONAL RESPONSE CENTER

DO NOT WRITE BELOW THIS LINE.

C

DTSC 8022A (1/99)
EPA 8700-22

Yellow: GENERATOR RETAINS

State of California—Environmental Protection Agency
Form Approved OMB No. 2050-0039 (Expires 9-30-99)
Please print or type (Form designed for use on elite (12-pitch) typewriter.

See Instructions on back of page 6.

Department of Toxic Substances Control
Sacramento, California

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. CAD098237950 | Manifest Document No. 93063 | 2. Page 1 of 1 | Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address
Cal-Iron Plating
11919 Rivera Road., Santa Fe Springs,CA 90670
4. Generator's Phone (562) 945-1181 POC: Carl Troncale

A. State Manifest Document Number: 22993063
B. State Generator's ID:

5. Transporter 1 Company Name: Environmental Resource Transportation
6. US EPA ID Number: CAR000108209
C. State Transporter's ID [Reserved.]
D. Transporter's Phone: (619) 661-4503

7. Transporter 2 Company Name:
8. US EPA ID Number:
E. State Transporter's ID [Reserved.]
F. Transporter's Phone:

9. Designated Facility Name and Site Address
US Ecology, Inc.
12 Miles South of highway 95
Beatty, NV 89003
10. US EPA ID Number: NVT330010000
G. State Facility's ID:
H. Facility's Phone: (800) 239-3943

11. US DOT Description (including Proper Shipping Name, Hazard Class, and ID Number)	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste Number
a. "RQ" Hazardous waste solid,n.o.s.,9,NA3077,III (F006,D007) (Filtercake)	003	DM	01200	P	State 181 / EPA/Other F006,D007
b.					State / EPA/Other
c.					State / EPA/Other
d.					State / EPA/Other

J. Additional Descriptions for Materials Listed Above
Approval # 11b 07-012- Filtercake
11b 07-012 7439 Floorsweep
11b Sludge with Chrome
11d 07-012 7221 Polishing Dust

K. Handling Codes for Wastes Listed Above
a. | b. | c. | d.

15. Special Handling Instructions and Additional Information
11b 171
11b 154
11d 130st

24 hours emergency # (619) 661-4503
Please bill to: RRD Environmental Services
19629, Alida Avenue, Cerritos, CA 90703
Phone: (562) 843 3154

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations.

If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

GENERATOR

Printed/Typed Name	Signature	Month	Day	Year
SHIRLEY MORALES	Shirley Morales	11	13	03

TRANSPORTER

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Month	Day	Year
		11	13	03

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Month	Day	Year

FACILITY

19. Discrepancy Indication Space

20. Facility Owner or Operator Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.

Printed/Typed Name	Signature	Month	Day	Year

IN CASE OF EMERGENCY OR SPILL, CALL THE NATIONAL RESPONSE CENTER 1-800-424-8802; WITHIN CALIFORNIA, CALL 1-800-852-7550

DO NOT WRITE BELOW THIS LINE.

DTSC 8022A (1/99)
EPA 8700-22

Yellow: GENERATOR RETAINS

bcc: RCRA Records Center, Room 722 (WST-6) with enclosure
WST-3 Reading File without enclosure
Ronald Brown, inspector (WST-3) with enclosure